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13 **RUTH APPLE**

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 **RUTH APPLE,**
17 Plaintiff,
18 vs.
19 **CSAA GENERAL INSURANCE COMPANY**
20 **dba AAA INSURANCE; CSAA INSURANCE**
21 **EXCHANGE dba AAA INSURANCE; and**
22 **MARIBEL LEYVA,**
23 Defendants.

Case No.: 2:19-cv-01093-RFB-CWH

STIPULATION AND PROPOSED ORDER TO
EXTEND TIME TO RESPOND TO DEFENDANTS'
MOTION TO DISMISS THE SECOND AND THIRD
CASES OF ACTION IN THE PLAINTIFF'S
COMPLAINT, OR IN THE ALTERNATIVE, TO
SEVER/BIFURCATE AND TO STAY CLAIMS FOR
BAD FAITH

(FIRST REQUEST)

24 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff Ruth Apple ("Plaintiff") and Defendants CSAA
25 General Insurance Company dba AAA Insurance and CSAA Insurance Exchange dba AAA
26 Insurance (collectively referred to as "Defendants"), by and through their attorneys of record,
27 hereby stipulate and agree to extend the time for Plaintiff to respond to Defendants' Motion to
Dismiss the Second and Third Causes of Action in Plaintiff's Complaint, or in the Alternative, to
Sever/Bifurcate and to Stay Claims (ECF No. 10) from the current deadline of July 15, 2019, up to
and including July 29, 2019. Additional time is being requested because Plaintiff and Plaintiff's
counsel were not placed on the court's service list, had not been served with the Motion, and

1 were unaware of the Motion until May 10, 2019. The Motion was served upon prior counsel
2 Mainor Wirth Injury Lawyers. This is the parties' first request to extend these deadlines to
3 respond.

4 This requested extension of time is sought in good faith and not for the purpose of causing
5 undue delay.

6 IT IS SO STIPULATED.

7 Dated this 12th day of June, 2019.

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9 REMPFER MOTT LUNDY, PLLC

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH, LLP

10 /s/ Joseph N. Mott

/s/ Philip A. John

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**CSAA General Insurance Company and
CSAA Insurance Exchange**

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17 **ORDER**

18 IT IS SO ORDERED.

19 Dated: July 15, 2019.

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RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE